

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HALLUM BAILEY and CAMPBELL SOUP  
COMPANY,

Movants,

v.

GAMON PLUS, INC. and GAMON  
INTERNATIONAL, INC.,

Respondents.

CASE NO. 1:24-CV-02877

JUDGE JOHN ROBERT BLAKEY

GAMON PLUS, INC. and GAMON  
INTERNATIONAL, INC.,

Plaintiffs,

v.

CAMPBELL SOUP COMPANY, MEIJER, INC.,  
THE KROGER CO., and TRINITY  
MANUFACTURING, L.L.C.,

Defendants.

*Underlying Action:*

CASE NO. 1:15-CV-08940

JUDGE JOHN ROBERT BLAKEY  
MAGISTRATE JUDGE YOUNG B. KIM

JURY TRIAL DEMANDED

**NOTICE OF PRESENTMENT OF GAMON'S UNOPPOSED MOTION  
FOR LEAVE TO FILE UNDER SEAL THEIR OPPOSITION TO HALLUM  
BAILEY AND CAMPBELL SOUP COMPANY'S MOTION TO QUASH THE  
SUBPOENA ISSUED TO HALLUM BAILEY AND FOR A PROTECTIVE ORDER**

To: Counsel of Record

PLEASE TAKE NOTICE THAT on Wednesday, May 1, 2024 at 11:00 a.m., or as soon thereafter as counsel may be heard, Gamon Plus Inc. and Gamon International Inc. shall appear before the Honorable John R. Blakey, or any other judge sitting in his place, in the courtroom usually occupied by him in the United States Courthouse, 219 South Dearborn Street, Chicago,

Illinois 60604, and present a copy of Plaintiffs' Unopposed Motion for Leave to File Under Seal Their Opposition to Hallum Bailey and Defendant Campbell Soup Company's Motion to Quash the Subpoena Issued to Hallum Bailey Baily and for a Protective Order.

Dated: April 23, 2024

Respectfully submitted,

By: /s/ Kal K. Shah

Kal K. Shah  
Mircea A. Tipescu

**BENESCH FRIEDLANDER  
COPLAN & ARONOFF LLP**  
71 South Wacker Drive, Suite 1600  
Chicago, Illinois 60606-4637  
Telephone: 312.212.4949  
kshah@beneschlaw.com  
mtipescu@beneschlaw.com

*Attorneys for Gamon Plus, Inc. and  
Gamon International, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 23, 2024, the foregoing document was filed via the Court's CM/ECF system, which will automatically serve and send email notification of such filing to all registered attorneys of record.

/s/ Kal K. Shah

*One of the attorneys for Gamon Plus, Inc. and  
Gamon International, Inc.*